

## Physician Update on CMS Letter Received at Baylor St. Luke's

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**Sent from William M. Granberry, Chief of Staff, Baylor St. Luke's Medical Center**

February 8, 2019

Fellow Medical Staff:

As you may know, CMS is planning a full site investigation at our hospital. This type of review is rare and can result in immediate jeopardy for CMS funding. It is also a full examination of all aspects of the hospital from the ED to the OR and from the cafeteria to the cath lab.

The hospital has begun preparing for this visit and has defined key areas that require immediate attention – **many of which are fully within our day-to-day responsibility.**

As a member of the medical staff, please focus particular attention in the following areas:

- Completion of all aspects of the history and physical—100 percent of H&P's must be completed and done in a timely manner
- Verbal orders are generally not acceptable except in emergency situations
- Pre-sedation and post-procedural notes must be completely documented at the appropriate times
- Anything handwritten must be dated and timed
- Moderate sedation documentation must be fully completed before the procedure
- "Pre-signed" order sets will no longer be accepted
- Immediate post-procedure note must be documented after the procedure (not before the procedure is finished)
- Staff may not document in any situation using a medical provider's log-in

CMS will look for the following also:

- Hand Hygiene – before and after patient contact (gel-in and gel-out)
- Food in any patient care area
- Wearing appropriate isolation gear when indicated
- Following OR policy for scrubs, caps and masks:
  - NO HAIR visible outside the cap
  - Remove facemask upon leaving the OR
  - Remove shoe covers upon leaving the OR
  - Only hospital-supplied scrubs
  - Wear a lab coat when leaving the OR in scrubs
  - Change scrubs when soiled with any body fluids
- Do not use any unapproved abbreviations

- Adherence to universal protocols
  - Performing a “time out”
  - Marking the surgical site
  - Use two patient identifiers

This is an extremely serious matter and these issues are not up for debate at this time. The hospital can be suspended from Medicare as a result of this survey. I urge you to cooperate with your nursing and administrative leaders to ensure a good review. I would also encourage each physician to ask not what the hospital can do for you but what you can do for the hospital.

**The nursing and patient care staff will be empowered to remind practitioners of variations from policy and insist on compliance before proceeding. Please respect them and all the providers in the hospital.**

It is time for “All Hands on Deck” and an opportunity to bring much-needed improvements across the hospital. I personally believe that this survey will be a unifying and transformative experience for the medical staff and will demonstrate the truly wonderful patient care provided at Baylor St. Luke’s Medical Center Hospital.